

¹ The Complaint was filed on November 5, 2020 but never served on Defendant.

Finance, LLC. BI-LO Holding Finance, LLC is a Delaware limited liability company whose sole member is Southeastern Grocers, Inc. f/k/a Southeastern Grocers, LLC.²

3. Venue is proper in this matter in the Aiken Division of this Court in accordance with 28 U.S.C. §1441(a).

4. Upon information and belief, the amount in controversy in this matter exceeds \$75,000.00 as Plaintiff refused to stipulate thereto in an email dated November 25, 2020. *See* Exhibit 1.

5. Defendant has filed no pleadings in this action with the Court of Common Pleas for the State of South Carolina in response to this Amended Complaint; however, Defendant's Answer is filed herewith contemporaneously.

6. Defendant will promptly furnish a copy of this Notice of Removal to the Clerk of Court for Aiken County upon receipt of a filed copy thereof.

Respectfully submitted,

SWEENEY, WINGATE & BARROW, P.A.

s/Ryan C. Holt

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ATTORNEYS FOR THE DEFENDANT

Columbia, South Carolina
December 1, 2020

² Upon information and belief, the proper name for the entity which controlled the location of the incident is Samson Merger Sub, LLC. The same jurisdictional analysis applies as for BI-LO, LLC since the single member of Samson Merger Sub, LLC is BI-LO, LLC.